



*United States Attorney  
Southern District of New York*

*86 Chambers Street  
New York, New York 10007*

October 14, 2020

**By ECF**

The Honorable Robert D. Drain  
United States Bankruptcy Judge  
United States Courthouse  
300 Quarropas Street  
White Plains, NY 10601-4140

Re: *In re Purdue Pharma L.P., et al.*, No. 19-23649 (RDD)

Dear Judge Drain:

I write respectfully on behalf of the United States (the “Government”) to request permission to file a Statement of Interest (“Statement”) in response to the UCC’s Motion to Compel Production of certain documents (the “Motion”), filed on September 30, 2020. Among other things, the Motion seeks the production of PowerPoint presentations made to the Government and settlement communications involving the Government. In light of the need to consult with multiple components within the Department of Justice on this issue, the Government respectfully requests permission to file this Statement by Monday, October 19. We recognize that the UCC may want to respond to the Statement, and thus we are proposing a date in advance of the UCC’s reply deadline of October 25, 2020.

We apologize to the Court and to the parties for making this late request, as opposition briefs are due today. The UCC contacted the Government in late April regarding presentations that Purdue has made to the DOJ, and asked for the DOJ’s position on the production of these materials. We did not provide a position during or after that call. DOJ has recently determined, however, that it will oppose certain aspects of the UCC’s motion, and the Government would like to have its views heard by the Court. Once we made this determination, we reached out to the UCC and Debtors to seek their consent. The UCC and Debtors have consented to this request, although the UCC indicated that it may ask the Court for unspecified “related relief.”

We thank the Court for its consideration of this matter.

Respectfully submitted,

AUDREY STRAUSS  
Acting United States Attorney for the  
Southern District of New York

By: /s/ Lawrence H. Fogelman  
LAWRENCE H. FOGELMAN  
PETER ARONOFF  
DANIELLE LEVINE  
Assistant United States Attorneys  
86 Chambers Street, Third Floor  
New York, New York 10007  
Telephone: (212) 637-2800  
Facsimile: (212) 637-2686  
Email: Lawrence.Fogelman@usdoj.gov  
Danielle.Levine@usdoj.gov  
Peter.Aronoff@usdoj.gov

Cc: All parties (By ECF)